

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

<b>DAVID E. MACK,</b>	§	
	§	
<b>Plaintiff,</b>	§	
v.	§	<b>CASE NO. 4:11-cv-793</b>
	§	
<b>EQUABLE ASCENT FINANCIAL, LLC,</b>	§	
	§	
<b>Defendant.</b>	§	

**PRE-TRIAL DISCLOSURES**

**1. The name and, if not previously provided, the address and telephone number of each witness whom the Defendant expects to present:**

Robert Rodriguez  
Director of Analytical Operations  
Equable Ascent Financial, LLC  
c/o Bush & Ramirez, LLC  
5615 Kirby Dr., Suite 900  
Houston, Texas 77005  
(713) 626-1555

**2. The name and, if not previously provided, the address and telephone number or each witness whom the Defendant may call if the need arises:**

Keith Wier  
Bush & Ramirez, LLC  
5615 Kirby Dr., Suite 900  
Houston, Texas 77005  
(713) 626-1555

**3. The designation of witnesses whose testimony the Defendant expects to present by deposition**

None. No depositions have been taken in this matter.

**4. An identification of each document or other exhibit, including summaries or other evidence, separately identifying those items the Defendant expects to offer:**

Plaintiff, David E. Mack's Responses to Defendant's First Set of Interrogatories and Request for Production of Documents;

**5. An identification of each document or other exhibit, including summaries or other evidence, separately identifying those items the Defendant may offer if the need arises:**

None.

WHEREFORE, the Defendant respectfully requests that the Court and all parties hereto take notice of the filing of these Pre-Trial Disclosures and for such other and further relief, both at law and in equity to which the Defendant may be justly and legally entitled.

Respectfully submitted,

**BUSH & RAMIREZ, LLC**

*//s// Keith Wier*

---

Keith Wier; SBN: 21436100  
Fed. ID No.: 7930  
5615 Kirby Dr., Suite 900  
Houston, TX 77005  
Telephone: (713) 626-1555  
Facsimile: (713) 622-8077

**ATTORNEY FOR DEFENDANT,  
EQUABLE ASCENT FINANCIAL, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 26<sup>th</sup> day of November, 2012, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system and provided a copy to Plaintiff by certified mail, return receipt requested as follows:

David E. Mack  
7720 McCallum Blvd., #2099  
Dallas, TX 75252

*via cmrrr # 7010 2780 0002 0702 1159*

//s// Keith Wier  
Keith Wier